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IN REPLY TO LTR. NO.

ORIG. & TYPIST INITIALS R14 /4/6 9F 46469 (8/86)

LTR. APPROVALS Bader C.

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Rocky Flats Plant

P.O. Box 464

(303) 966-7000

Rockwell International Corporation

Contractor to U.S. Department of Energy

Golden, Colorado 80402-0464

Rockwell International



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WS-LT-00105

87-RF-1739

MAR 6 1987

Albert E. Whiteman Area Manager DOE, RFAO

Attn: Ron Reed

SURFACE RUNOFF OF SPRAY IRRIGATED WATER FROM THE SEWAGE TREATMENT PLANT EFFLUENT NPDES PERMIT NO. CO-0001333

Management requirements in our NPDES permit, page 16, part 5, require prompt notification to the EPA Regional Administrator and the State in writing of each diversion or bypass. Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except where excessive storm drainage or runoff would damage any facilities necessary for compliance with the effluent limitations and prohibitions of this permit.

According to the requirements of this NPDES permit, treated sanitary sewage from the Rocky Flats Sewage Treatment Plant must be spray irrigated and there shall be no discharge from Pond B-3 except when weather conditions (precipitations, snow melt, and/or extreme low temperatures) result.

Spray irrigation of the treated sanitary sewage has been done in accordance with good engineering practices since 1979 at Rocky Flats. However, on March 2, 1987, because of the degree of saturation of the spray fields with snow melt, some surface runoff of the treated sanitary sewage was experienced. The combined snow melt, treated sanitary sewage, and natural drainage in the area flowed into the Woman Creek drainage. This water circumvented the permitted NPDES discharge locations resulting in a technical violation of the Rocky Flats NPDES permit.

> **ADMIN RECORD** SW-A-003962

87-RF-1739

Analytical results from the treated sanitary sewage effluent at the advanced waste water treatment plant showed good water quality and no adverse impact is expected on Woman Creek.

The corrective actions being taken to preclude a reoccurrence of this surface runoff are:

(1) Installation of a second spray irrigation field which will increase the acreage for spray irrigated water.

(2) Discharge the treated sanitary sewage through Discharge Location 001 when weather conditions prevent proper spray irrigation.

(3) Installation of a perimeter trench around the primary spray field to divert surface flows into Location 007 as an engineering safeguard. (feasibility study ongoing)

(4) Enhance administrative controls by Rockwell personnel to provide additional surveillance of the spray irrigation fields.

Please notify the following people by March 6, 1987.

Mr. Pat Godsil, Chief Compliance Branch Water Management Division U. S. Environmental Protection Agency, Region VIII One Denver Place 999 - 18th Street, Suite 1300 Denver, CO 80202-2413

Colorado Department of Health Attn: Stanley V. May Monitoring and Enforcement Section Water Quality Division 4210 East Eleventh Avenue Denver, CO 80220

George W. Campbell, Director Health, Safety and Environment

Orig. and 1 cc - A. E. Whiteman